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9 *Attorneys for Defendants*
10 *Don C. Keenan; D.C. Keenan & Associates, P.A.; and*
William Entrekin

11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 SEAN K. CLAGGETT & ASSOCIATES, LLC) Case No.: 2:21-cv-02237-GMN-DJA
14 D/B/A CLAGGETT & SYKES LAW FIRM, A)
NEVADA LIMITED LIABILITY COMPANY;)
SEAN K. CLAGGETT, AN INDIVIDUAL)
15 Plaintiffs,) STIPULATION AND [PROPOSED]
16 v.) ORDER TO EXTEND
17 DON C. KEENAN, AN INDIVIDUAL; D.C.) DEFENDANTS DON C. KEENAN,
KEENAN & ASSOCIATES, P.A. D/B/A) D.C. KEENAN & ASSOCIATES,
KEENAN LAW FIRM, A GEORGIA) P.A., AND WILLIAM ENTREKIN'S
PROFESSIONAL ASSOCIATION; KEENAN'S) TIME TO RESPOND TO
KIDS FOUNDATION, INC., D/B/A KEENAN) PLAINTIFFS' MOTION TO
TRIAL INSTITUTE AND/OR THE KEENAN) REMAND [ECF NO. 13]
EDGE, A GEORGIA NON-PROFIT)
CORPORATION; BRIAN F. DAVIS, AN)
INDIVIDUEAL; DAVIS LAW GROUP, P.A., A)
NORTH CAROLINA PROFESSIONAL)
ASSOCIATION; DAVID J. HOEY, AN)
INDIVIDUAL; TRAVIS E. SHTLER, AN)
INDIVIDUAL; WILLIAM ENTREKIN, AN)
INDIVIDUAL; DOES I-X; AND ROE)
BUSINESS ENTITIES XI-XX, INCLUSIVE,)
26 Defendants.)
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28 Plaintiffs, SEAN K. CLAGGETT & ASSOCIATES, LLC d/b/a CLAGGETT &
SYKES LAW FIRM and SEAN K. CLAGGET (collectively "Plaintiffs") and Defendants

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1 DON C. KEENAN D.C., KEENAN & ASSOCIATES, P.A., and WILLIAM ENTREKIN
2 (collectively "Defendants"), by and through their respective counsel of record, hereby
3 stipulate and agree as follows:

4 WHEREAS counsel for the Defendants subject to this stipulation must withdraw
5 from representation due to a previously unknown conflict, and successor counsel is
6 expected to appear in the near future;

7 Plaintiffs' SEAN K. CLAGGETT & ASSOCIATES, LLC d/b/a CLAGGETT &
8 SYKES LAW FIRM and SEAN K. CLAGGETT hereby stipulate and agree that
9 Defendants, DON C. KEENAN D.C., KEENAN & ASSOCIATES, P.A., and WILLIAM
10 ENTREKIN, shall have a ten (10) day extension of time in which to respond to Plaintiffs'
11 *Motion to Remand* filed January 14, 2022, in the above-captioned matter, with the new
12 date to respond to said motion through and including **Monday, February 7, 2022**.

13 IT IS SO AGREED as stated above.

14 DATED this 28th day of January, 2022.

15 DATED this 28th day of January, 2022.

16 INJURY LAWYERS OF NEVADA

17 LIPSON NEILSON P.C.

18 /s/ Jared B. Anderson

19 /s/ Joseph P. Garin

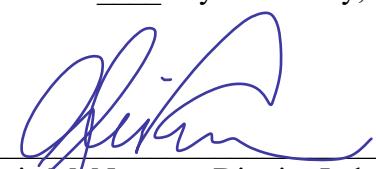
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29 Attorneys for Plaintiffs

30 Attorneys for Defendants
31 Don C. Keenan; D.C. Keenan &
32 Associates, P.A.; and William Entrekin

33 Dated this 31 day of January, 2022

34 
35 Gloria M. Navarro, District Judge
36 UNITED STATES DISTRICT COURT

1 Case No.: 2:21-cv-02237-GMN-DJA
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ORDER

4 The stipulation of counsel to extend Defendants' DON C. KEENAN D.C.,
5 KEENAN & ASSOCIATES, P.A., and WILLIAM ENTREKIN time to respond to Plaintiffs'
6 Motion for Remand is hereby approved and so ORDERED.

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8 United States Magistrate Judge
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10 Dated: _____
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